

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-26 and 37-50 are pending in this application. Claims 1, 8, 14, and 15 are amended, and support for the amendments is found in the Applicants' specification at least on page 29, line 2 to page 31, line 1. Claims 37-50 are newly added, and support for the newly added claims is found in original claims 1-14. It is respectfully submitted that no new matter is added by this amendment.

In the outstanding Office Action, Claims 1-2, 6, 12, 15-17, 20-21, and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takayama (U.S. Patent No. 6,477,528) in view of Kawasaki et al. (U.S. Patent No. 5,969,828, herein Kawasaki); Claims 3 and 9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takayama and Kawasaki in view of Nakagawa et al. (U.S. Patent No. 5,819,295, herein Nakagawa); Claims 4, 5, and 29 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takayama, Kawasaki, and Nakagawa in further view of Murata (U.S. Patent No. 6,606,161); and Claims 7, 8, 10, 11, 13, 18, 19, 22-25 and 31-32 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takayama and Kawasaki in view of Murata.

Briefly recapitulating, amended Claim 1 recites the following:

An image managing apparatus including image storing means for storing image data including a plurality of files, said image managing apparatus comprising:

means for separating **each of the plurality of files into a plurality of single unit images;**

first managing means for generating first management information used to manage the image data on a single unit image basis;

second managing means for generating second management information used to manage an image file that comprises at least one of the plurality of single unit images; and

means for individually accessing at least one of the plurality of single unit images using at least one of said first managing means and second managing means. (emphasis added)

The structure of amended Claim 1 enables an operator to access a single unit image from any of the plurality of files or combine single unit images from a plurality of different files without having to access the entire file to obtain single unit images within the file. Therefore, the claimed invention provides an image managing apparatus capable of reading the entire designated data made up of a plurality of single unit images or only a desired part of the entire image data.<sup>1</sup> Independent Claim 15 recites substantially similar features. Claims 8 and 14 were amended to provide proper antecedent basis.

Takayama is directed to a file management system, an electronic filing system, and a hierarchical structure display method that visually and comprehensively presents the location of a file to a user when a file is recorded, managed, or retrieved.<sup>2</sup> Takayama discloses a database including a page management table and document management table. However, as shown in Figure 4 of Takayama, a page corresponds to a product catalog, unexamined Japanese patent application, and Japanese patent. Therefore, the page recited in Takayama corresponds to an entire document or file and does not correspond to the “single unit image” of a file as recited in amended Claim 1. Accordingly, the page management table and document management table of Takayama are not equivalent to the first management information and second management information recited in amended Claim 1.

Therefore, Takayama fails to teach or suggest “separating each of the plurality image files into a plurality of **single unit images**; ... generating first management information used to manage the image data on a **single unit basis**; ... generating second management information used to manage an image file that comprises at least one of the plurality of **single unit images**; and ... individually accessing at least one of the plurality of **single unit images**,” as recited in amended Claim 1.

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<sup>1</sup> Applicants’ specification, page 4, lines 10-14.

<sup>2</sup> Takayama, column 1, lines 55-62.

Kawasaki is directed to a digital copying machine and an image reading device used in the digital copying machine to take in the image of an original document, compress the image data and store it in an image memory.<sup>3</sup> In Kawasaki, the digital copying machine includes compressors, expanders, and an image information dividing manager for dividing the image information generated by the document reader into a plurality of image information blocks.<sup>4</sup> More specifically, since the input image data is compressed after being divided by a specific dividing method according to the number of expanders, a plurality of expanders can be operated efficiently, thereby the printing can be started earlier and the copying speed is increased.<sup>5</sup> Kawasaki fails to disclose, teach, or suggest individually accessing the image information blocks.

Therefore, Kawasaki fails to teach or suggest “means for individually accessing at least one of the plurality of single unit images,” as recited in amended Claim 1. Further, Kawasaki fails to cure the deficiencies of Takayama discussed above regarding the first management information and second management information recited in amended Claim 1.

Furthermore, it is not clear from the record how the teachings of the image information dividing manager of Kawasaki could be incorporated into the file management system of Takayama. Under such a modification, the file management system of Takayama would have to be modified to individually store, access, and display each of the plurality of information blocks created by the image information dividing device of Kawasaki, and as discussed above, even Kawasaki does not disclose individually accessing each of the plurality of information blocks. Such modification would require a substantial reconstruction or redesign of the file management system of Takayama. Further, there is no evidence that a person of ordinary skill in the art would be motivated to perform such changes and redesign

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<sup>3</sup> Kawasaki, column 1, lines 9-15.

<sup>4</sup> Kawasaki, column 4, lines 28-44.

<sup>5</sup> Kawasaki, column 16, lines 26-33.

considering that Takayama is primarily directed to hierarchically displaying the location of a stored file, whereas Kawasaki is primarily directed to maximizing image data compression speed and printing speed.

Therefore, in view of the present amendment and in light of the above discussion, the Applicants respectfully submit that amended Claims 1 and 15 are patentably distinguished over the cited references of Takayama and Kawasaki considered alone or in any proper combination. Accordingly, the Applicants respectfully request that the rejection to Claims 1 and 15 under 35 U.S.C. §103(a) as unpatentable over Takayama in view of Kawasaki be withdrawn.

Moreover, the cited references of Nakagawa and Murata are also not believed to cure the deficiencies of Takayama and Kawasaki with respect to amended independent Claims 1 and 15. Therefore, it is also respectfully requested that the prior art rejections of dependent Claims 2-14 that depend from amended Claim 1 and Claims 16-26 that depend from amended Claim 15 also be withdrawn.

New Claims 37-50 correspond to Claims 1-14 rewritten in non-means-plus-function language, and therefore new Claims 37-50 should not be interpreted under 35 U.S.C. §112, sixth paragraph. However, Applicants respectfully submit that new Claims 37-50 are patentably distinguished over the cited references based on similar reasoning as discussed above with respect to Claims 1-14.

As no other issues are believed to remain outstanding relative to this application, it is believed to be clear that this application is in condition for formal allowance and an early and favorable action to this effect is, therefore, respectfully requested.

Respectfully submitted,

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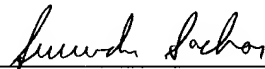
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